

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARTIN J. WALSH, SECRETARY OF LABOR, UNITED STATES DEPARTMENT OF LABOR,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 2:21cv02583
	)	CFK
	)	
NURSING HOME CARE MANAGEMENT INC.	)	
d/b/a PRESTIGE HOME CARE AGENCY,	)	
AND ALEXANDER DORFMAN,	)	
	)	
Defendants.	)	
	)	

**STIPULATION FOR EXTENSION OF TIME TO FILE MOTIONS TO AMEND THE  
PLEADINGS AND TO JOIN OR ADD ADDITIONAL PARTIES**

Plaintiff, Martin J. Walsh, Secretary of Labor, United States Department of Labor (“Plaintiff”), and Defendants Nursing Home Care Management Inc. d/b/a/ Prestige Home Care Agency and Alexander Dorfman (together, “Defendants”), by and through their undersigned counsel, hereby STIPULATE AND AGREE:

1. Plaintiff filed this action alleging minimum wage, overtime, and recordkeeping violations of the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 299 *et seq.*
2. The Parties exchanged initial discovery requests on December 16, 2021.
3. On January 18, 2022, following a pretrial conference, the Court issued its Scheduling Order, ECF No. 18. The Scheduling Order set February 18, 2022 at 12:00 as the deadline for all motions to amend the pleadings and to join or add additional parties.
4. Following the conference, on January 27, 2022, the Parties served responses to initial discovery requests, and have begun to exchange documents responsive to the initial document requests.

5. The Parties dispute whether certain categories of information and documents requested should be produced, including certain documents relating to Defendant Prestige Home Care Agency's ownership, management, and corporate structure, which the Parties will attempt to resolve informally without Court intervention. Because certain outstanding discovery may inform whether additional defendants should be added, the Parties respectfully submit that additional time is required to file any motions to amend and to add or join additional parties.

6. Accordingly, the Parties respectfully request an extension of the deadline to move to amend the pleadings or add parties from 12:00 p.m. on February 18, 2022 to 12 p.m. on April 1, 2022. The requested extension will not affect any dispositive motion deadlines or dates thereafter, including trial.

7. This is the Parties' first request for an extension of the deadline to amend or add parties. No Party will be prejudiced by the extension of deadlines set forth in this Stipulation.

8. The Parties have consented to the use of electronic signatures on this Stipulation.

WHEREFORE, for the reasons set forth above, the Parties respectfully request that the Court grant the Parties' request to amend the Scheduling Order and extend the deadline to file any motions to amend or to add or join additional parties.

Respectfully submitted,

By: /s/ Deirdre A. Aaron

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Dated: February 10, 2022

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*Attorneys for Defendants*

Dated: February 10, 2022

The foregoing stipulation is hereby approved by **ORDER** of the Court this 17th day of February, 2022. The deadline for all motions to amend the pleadings and to join or add additional parties is hereby extended to April 1, 2022.

/s/ Chad F. Kenney

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The Hon. Chad F. Kenney